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November 14, 2022

**VIA ECF**

Honorable Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Payamps v. City of New York et al.,  
22-CV-0563 (AMD) (VMS)

Your Honor:


I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York ("City"), Mayor Bill de Blasio, New York City Police Commissioner Dermot Shea, New York City Police Department ("NYPD") Chief of Department Terence Monahan, Police Officer Daniel Auguste, and Police Officer Corey Johnson (collectively "Defendants") in the above-referenced matter. Defendants write in accordance with the Court's October 7<sup>th</sup>, 2022 Order directing defendants to respond to plaintiff's letter dated October 4<sup>th</sup>, 2022<sup>1</sup>. (See ECF No. 31).

Defendants join plaintiff's application to refer the instant case to the mediation program. Moreover, the parties have been diligently conferring with the Court's mediation office. Currently, mediation in this case is scheduled for January 12, 2023. Thus, defendants' belated response will not delay the parties joint interest to pursue mediation.

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<sup>1</sup> Defendants apologize for not complying with the Court's October 7<sup>th</sup>, 2022 Order directing defendants to respond to plaintiff's letter by October 12, 2022.

Defendants thank the Court for its time and consideration.

By:   
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Michael Pesin-Virovets  
*Senior Counsel*

cc: **By ECF**

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